

IN THE UNITED STATES DISTRICT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

Microtel Inns & Suites Franchising, Inc.,)
a Georgia Corporation,)
Plaintiff,) Case No.
v.) 1:11-cv-04479-ODE
SAINT STEPHEN, LLC,)
a North Carolina Limited Liability)
Company; JITENDRA PATEL, an)
individual; and RASHIMA PATEL, an)
individual,)
Defendants.)

PLAINTIFF MICROTEL INNS & SUITES FRANCHISING, INC'S
MOTION FOR ENLARGEMENT OF TIME TO FILE REPLY TO
DEFENDANT RASHIMA PATEL'S OPPOSITION TO PLAINTIFF'S
MOTION FOR ENTRY OF DEFAULT JUDGMENT

NOW COMES Plaintiff Microtel Inns & Suites Franchising, Inc. ("MISF"), and hereby requests enlargement of time to file a limited reply brief in response to issues raised by Defendant Rashima Patel in her Opposition to Plaintiff's Motion for Entry of Default Judgment.

MISF filed its Motion for Entry of Default Judgment against Defendants Jitendra Patel and Rashima Patel on July 6, 2012. Defendant Rashima Patel filed an opposition brief on July 27, 2012. In her opposition brief, Defendant Rashima

Patel asserts that she was not properly served with the Complaint and that she did not become aware of the lawsuit Plaintiff filed against her until she was served with Plaintiff's Motion for Entry of Default on July 12, 2012. MISF requests that it be granted seven additional days, through and including August 31, 2012, to file a reply to Defendant Rashima Patel's opposition brief. MISF is in the process of working with its outside process server company, MLQ Attorney Services, to prepare supporting affidavits in response to Defendant Rashima Patel's contentions regarding improper service. MISF attaches as Exhibit "A" a proposed order for the Court's consideration.

Respectfully submitted this 24th day of August, 2012.

s/Elisa S. Kodish
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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the forgoing **PLAINTIFF
MICROTEL INNS & SUITES FRANCHISING, INC'S MOTION FOR
ENLARGEMENT OF TIME TO FILE REPLY TO DEFENDANT
RASHIMA PATEL'S OPPOSITION TO PLAINTIFF'S MOTION FOR
ENTRY OF DEFAULT JUDGMENT** by causing a copy of same to be deposited
in the United States Mail, postage prepaid and addressed as follows:

Jitendra Patel
4622 South Ocean Blvd.
North Myrtle Beach, SC 29582

Rashima Patel
5055 North Arco Lane
North Charleston, SC 29418

This 24th day of August, 2012.

s/Elisa S. Kodish
Elisa S. Kodish